

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

STACY L. RANDALL,)
v.)
REED C. WIDEN, MICHAEL)
KIESLER, WIDEN ENTERPRISES,)
LLC, and WINDY WATERS, INC.,)
Plaintiff,)
Defendants.)
)

) Civil Action No. 22-cv-400

DEFENDANTS' MOTION TO DISMISS THE COMPLAINT

Defendants Reed C. Widen, Michael Kiesler, Widen Enterprises LLC, and Windy Waters, Inc. (collectively, “Defendants”), through undersigned counsel, hereby move to dismiss Plaintiff Stacy L. Randall’s Complaint in its entirety with prejudice. Defendants seek dismissal for lack of standing and failure to state a claim upon which relief can be granted pursuant to Federal Rule of Civil Procedure 12(b)(6), all of which grounds are stated more fully in Defendants’ accompanying memorandum of law in support.

Dated: September 26, 2022

Respectfully submitted,

/s/ Dean P. Laing

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CERTIFICATE OF SERVICE

I hereby certify that on this 26 day of September 2022, I electronically filed the foregoing document using the Court's CM/ECF system, copies of which will be sent electronically to the registered participants, as identified on the Notice of Electronic Filing.

/s/ Dean P. Laing

Dean P. Laing

Counsel for Defendants